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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE: UBER TECHNOLOGIES, INC.,  
32 PASSENGER SEXUAL ASSAULT  
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This Document Relates to:

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ALL ACTIONS

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Case No. 3:23-md-03084-CRB

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DEFENDANTS UBER TECHNOLOGIES,  
60 INC., RASIER, LLC, RASIER-CA, LLC'S  
61 STATEMENT IN SUPPORT OF  
62 PLAINTIFFS' ADMINISTRATIVE  
63 MOTIONS TO CONSIDER WHETHER  
64 ANOTHER PARTY'S MATERIALS  
65 SHOULD BE SEALED [ECF Nos. 2088  
66 AND 2090]

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**DEFENDANTS' STATEMENT IN SUPPORT OF SEALING****CONFIDENTIAL MATERIALS**

Pursuant to Civil Local Rules 79-5(f)(3) and (c)(1) and the Protective Order entered in this case dated December 28, 2023, ECF 176 (“Protective Order”), Defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC (collectively “Uber”), respectfully submit this statement in support of Plaintiffs’ Administrative Motions to Consider Whether Another Party’s Material Should Be Filed Under Seal, dated January 15, 2025, ECF 2088 and 2090 (“Plaintiffs’ Motion(s)”).

**I. BACKGROUND AND REQUESTED SEALING**

Plaintiffs’ Motions concern three documents:

Document	Description	Designating Party
Portions of Ex. A to Ellis Declaration ISO Joint Discovery Letter re: Tranche 2 Random Selection Privilege Disputes (ECF 2089-1, 2089-2)	A chart of entries from a confidential privilege log containing personal email addresses (proposed redactions filed as <b>Exhibit A</b> )	Uber
Portions of Ex. A to Ellis Declaration ISO Joint Discovery Letter re: Tranche 3 Privilege Disputes (ECF 2091-1, 2091-2)	A chart of entries from a confidential privilege log containing personal email addresses and other confidential information (proposed redactions filed as <b>Exhibit B</b> )	Uber
Portions of Joint Discovery Letter Brief re: Tranche 3 Privilege Disputes (ECF 2091)	A joint letter brief containing two redactions of confidential information	Uber

The documents at issue are two exhibits containing entries to a confidential privilege log, and a letter brief containing two redactions. Uber submits redacted versions of the two privilege log exhibits, which were filed under seal (ECF 2089-2; ECF 2091-2), as Attachments A and B to this Statement. The redacted portions of these documents consist of personal identifying information, namely non-public email addresses of Uber employees, and information regarding a confidential pilot program contained in the letter brief and one of the privilege log exhibits. *See* Cummings Decl. ¶¶ 2-5. Disclosure of these documents would harm the privacy interests of these individuals and Uber’s competitive standing and legitimate privacy interests. Uber therefore submits this statement

1 requesting that the Court seal the un-redacted versions of the letter brief and exhibits under Local Rule  
 2 79-5(f)(3).

3 **II. LEGAL STANDARD**

4 Documents which do not relate directly to the merits of a case are properly sealed when a  
 5 moving party makes “a particularized showing under the good cause standard of Rule 26(c).”  
 6 *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006) (internal quotations  
 7 and citations omitted); *see also Ctr. For Auto Safety v. Chrysler Group, LLC*, 809 F.3d 1092, 1101-02  
 8 (9th Cir. 2016). Federal Rule of Civil Procedure 26(c) states that good cause may exist when issuing  
 9 an order to seal is necessary to “protect a party or person from annoyance, embarrassment, oppression,  
 10 or undue burden or expense.” Fed. R. Civ. P. 26(c).

11 The documents here are related to briefing on privilege disputes; they are not related to a  
 12 dispositive motion. *See United States v. Selugh*, 896 F. 3d 1007, 1015 (9<sup>th</sup> Cir. 2018); *Brown v. Google*  
 13 LLC, 2022 WL 4227545, at \*1; *Adtrader, Inc. v. Google LLC*, 2020 WL 6387381 at \*1 (N.D. Cal.  
 14 Feb. 24, 2020). Therefore, the good cause standard applies. Discovery motion materials “are actually  
 15 one step further removed in public concern from the trial process than the discovery materials  
 16 themselves.” *Selugh*, 896 F. 3d at 1015. District Courts have discretion to balance the interests of  
 17 private parties and public disclosure when deciding to seal documents. *Kamakana*, 447 F.3d at 1180.

18 “Courts in this circuit routinely seal email addresses and other personal identifying information  
 19 under the compelling reasons standard due to the potential privacy harm to the individual whose  
 20 contact information may be exposed.” *Jones v. PGA Tour, Inc.*, 2023 WL 7434197, at \*2 (N.D. Cal.  
 21 Oct. 5, 2023); *see also In re Pac. Fertility Ctr. Litig.*, 2021 WL 1082843, at \*2 (N.D. Cal. Mar. 12,  
 22 2021) (noting that “there are compelling reasons to seal customer names, … as well as employee email  
 23 addresses”). Courts also routinely seal confidential business information under the good cause  
 24 standard, such as business plans. *See, e.g., Blockchain Innovation, LLC v. Franklin Resources, Inc.*,  
 25 2024 WL 4394758, at \*3 (N.D. Cal. 2024) (sealing documents containing confidential information on  
 26 “internal business strategy and corporate decisionmaking, as well as internal budgeting and finances”);  
 27 *Jones v. PGA Tour, Inc.*, 2023 WL 7440303, at \*2 (N.D. Cal. 2023) (sealing document containing

1 confidential information on, among other things, “strategic launch plans; financials; internal decision-  
 2 making processes”); *Skillz Platform Inc. v. AviaGames Inc.*, 2023 WL 6135556, at \*2 (N.D. Cal. 2023)  
 3 (sealing confidential information such as “internal business plans and propriet[ar]y information about  
 4 a [party’s] products”).

5 **III. UBER’S MATERIAL SHOULD BE KEPT UNDER SEAL**

6 The documents at issue are two exhibits containing entries from a confidential privilege log,  
 7 and a letter brief containing two redactions. Uber submits redacted versions of the two privilege log  
 8 exhibits, which were filed under seal (ECF 2089-2; ECF 2091-2), as Attachments A and B to this  
 9 Statement. The redacted portions of these documents consist of personal identifying information,  
 10 namely non-public email addresses of Uber employees, and information in the letter brief and an email  
 11 subject line in a privilege log exhibit regarding a confidential pilot program. *See* Cummings Decl.  
 12 ¶¶ 2-5. Uber has a legitimate interest in sealing the un-redacted version of these documents in order  
 13 to avoid harm to the privacy interests of these individuals and its competitive standing and legitimate  
 14 privacy interests. There are no less restrictive alternatives to sealing the documents as the documents  
 15 have already been narrowly redacted. *See id.*

16 **A. Failing to Seal the Documents Would Harm Uber**

17 **Portions of Ex. A to Ellis Declaration ISO Joint Discovery Letter re: Tranche 2 Random  
 18 Selection Privilege Disputes:**

19 This document is an exhibit containing entries to a confidential privilege log. This exhibit was  
 20 used by Plaintiffs in the joint letter brief on Tranche 2 random selection privilege disputes (ECF 2088,  
 21 2089) submitted pursuant to the Court’s December 21, 2024 Order (ECF 2005). The redacted portions  
 22 of this document in Exhibit A to this filing consist of personal identifying information, namely non-  
 23 public email addresses of Uber employees. *Jones*, 2023 WL 7434197, at \*2; *In re Pac. Fertility Ctr.*  
 24 *Litig.*, 2021 WL 1082843, at \*2. No other redactions were made to this document. This Court has  
 25 previously permitted similar redactions of employee addresses on privilege logs. (ECF 2007; ECF  
 26 1947)

**1 Portions of Ex. A to Ellis Declaration ISO Joint Discovery Letter re: Tranche 3 Privilege****2 Disputes:**

3 This document is an exhibit containing entries to a confidential privilege log. This exhibit was  
 4 used by Plaintiffs in the joint letter brief on Tranche 3 privilege disputes (ECF 2090, 2091) submitted  
 5 pursuant to PTO 20 (ECF 1808) and the Court's December 21, 2024 Order (ECF 2005). The redacted  
 6 portions of this document in Exhibit B to this filing consist of personal identifying information, namely  
 7 non-public email addresses of Uber employees. *Jones*, 2023 WL 7434197, at \*2; *In re Pac. Fertility*  
 8 *Ctr. Litig.*, 2021 WL 1082843, at \*2. This Court has previously permitted similar redactions of  
 9 employee addresses on privilege logs. (ECF 2007; ECF 1947). Also redacted are the "Document  
 10 Title", "File Name", and "Email Subject" fields (all the same information) for one privilege log entry  
 11 related to a confidential pilot program. Courts routinely seal confidential business information under  
 12 the good cause standard, such as business plans. *See, e.g., Blockchain Innovation*, 2024 WL 4394758,  
 13 at \*3; *Jones*, 2023 WL 7440303, at \*2; *Skillz Platform*, 2023 WL 6135556, at \*2. No other redactions  
 14 were made to this document.

**15 Portions of Joint Discovery Letter re: Tranche 3 Privilege Disputes:**

16 This document is letter brief on Tranche 3 privilege disputes (ECF 2090, 2091) submitted  
 17 pursuant to PTO 20 (ECF 1808) and the Court's December 21, 2024 Order (ECF 2005). The redacted  
 18 portions of this document (two redactions) consist of references, in Plaintiffs' argument on one  
 19 document (JCCP\_MDL\_PRIVLOG056137), to a confidential pilot program. No other redactions  
 20 were made to this document.

**21 B. Less Restrictive Alternative to Sealing is Insufficient to Prevent Harm**

22 The documents have already been redacted, and the redacted versions have already been filed  
 23 on the docket (ECF 2091) or attached to this filing as Exhibit A and Exhibit B. No less restrictive  
 24 alternative to sealing the documents at issue is sufficient. *See* Cummings Decl. ¶¶ 2-5. Actions short  
 25 of sealing the documents would not protect the legitimate privacy interests of Uber employees and  
 26 Uber's competitive standing and legitimate privacy interests.

1 **IV. CONCLUSION**2 For the foregoing reasons, Uber respectfully requests that the Court order that the un-redacted  
3 versions of the documents listed above be maintained under seal.4  
5 DATED: January 21, 2025

Respectfully submitted,

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